

SUPPLEMENTAL RULE REVIEW

Engineer: Rene Toledo

Company Name: Buckeye Terminals, LLC

ATC Applications: ATC C-11-76 modifying P-54-93(t1) [Tank #15];
ATC C-11-77 modifying P-66-93(t1) [Tank #16]; and
ATC C-11-78 modifying P-45-94(t1) [Tank #18]

Date: November 7, 2011

I. PURPOSE

The following is the complete discussions for rules affecting this category of source and servers as a supporting document to all three ATC emission evaluations listed above.

II. APPLICABLE FEDERAL REQUIREMENTS

A. District Rule 2.3 – Ringelmann Chart

Rule Description

This rule specifies the allowable opacity limit for all sources operating in the District.

Compliance Status

The rule applies to any visible emissions at the stationary source. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

Rule 2.3, Requirement #1 (Permit Condition) - Opacity Requirement

A person shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this rule. [District Rule 2.3] *(Title V Condition IV.E.1)*

B. District Rule 2.5 – Nuisance

Rule Description

This rule requires that sources are not a public nuisance.

Compliance Status

The rule applies to all emission units at the stationary source. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of

the rule. The operation is expected to continue to comply with the rule. A condition will not be placed on the ATC, but will be added to the PTO upon implementation.

Permit Condition

The Permit Holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [District Rule 2.5] *(Title V Condition IV.F.1)*

C. District Rule 2.17 – Circumvention

Rule Description

This rule prevents sources from concealing emissions to the atmosphere.

Compliance Status

The rule is applicable to all emission units at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

Rule 2.17, Requirement #1 (Permit Condition) – Concealed Emissions

The Permit Holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [District Rule 2.17] *(Title V Condition IV.G.1)*

D. District Rule 2.21 – Organic Liquid Storage and Transfer

Rule Description

This rule specifies requirements for organic liquid storage and/or transfer operations to limit emissions of VOC.

Compliance Status

The rule applies to any storage tank with a capacity of greater than 250 gallons, any gasoline bulk plant, any terminal, or any transport vessel that stores or transfers an organic liquid with a true vapor pressure of 0.5 psia or greater. The version of the rule used in this evaluation was adopted on September 14, 2005 and is part of the current California SIP. The internal floating roof bulk gasoline storage tanks of P-54-93(45) [Tank #15], P-66-93(a2) [Tank #18], and P-45-94(a3) [Tank #18] are subject to and in compliance with the requirements of the rule.

Rule 2.21, Requirement #1 (Permit Condition) – Visible Organic Liquid

Organic liquid shall not be visible above the floating roof. [District Rule 2.21, §301.2] *(Title V Condition II.B2.2 / ATC C-11-76, -77, and -78 Condition 4)*

Rule 2.21, Requirement #2 – Floating Roof Liquid Contact

Section 301.3 requires that the floating roof be in contact with the liquid contents at all times except when the tank is completely emptied and subsequently refilled. Also, the section requires that the tank emptying or refilling be a continuous process.

Streamlining Demonstration for Operational Requirements: The floating roof liquid contact requirements of Section 301.3 have been streamlined with the requirements of 40 CFR Part 63.1063(b)(1) (and by reference with the requirements of 40 CFR Part 63.11087(a)).

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(1) and (b)(2) (see Rule Requirements #2 and #3 of 40 CFR Part 63 – Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 – Subpart BBBB)

Streamlined Permit Condition

The floating roof shall be in contact with the liquid contents (but not necessarily in complete contact with it) at all times except when the storage tank is completely emptied, and subsequently refilled to the point of refloating the roof. During this period, emptying or refilling shall be a continuous process, and shall be performed as soon as practical. [District Rule 2.21, §301.3, 40 CFR Part 63.1063(b), 40 CFR Part 63.11087(a)] *(Title V Condition II.B2.3 / ATC C-11-76, -77, and -78 Condition 5)*

Rule 2.21, Requirement #3 (Permit Condition) – Notification of Landing Roof Legs

The Permit Holder shall provide written notification to the Air Pollution Control Officer (APCO) at least seven (7) days prior to landing the floating roof on its legs. [District Rule 2.21, §301.4] *(Title V Condition II.B2.4 / ATC C-11-76, -77, and -78 Condition 6)*

Rule 2.21, Requirement #4 – Primary Liquid Seal Installation or Replacement

Section 301.5 requires that the installation of a new or replacement primary seal shall be a mechanical shoe seal or liquid mounted seal. The primary seal of each tank complies with this requirement.

Permit Condition

No condition required.

Rule 2.21, Requirement #5 (Permit Condition) – Internal Floating Roof Design Requirements

Internal floating roofs shall consist of two seals, one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred to as the secondary seal. [District Rule 2.21, §303.1] *(Title V Condition II.B2.6 / ATC C-11-76, -77, and -78 Condition 7)*

Rule 2.21, Requirement #6 (Permit Condition) – Internal Floating Roof Vapor Concentrations

Vapor concentrations above an internal floating roof shall not exceed 30% of its lower explosive limit (LEL). [District Rule 2.21, §303.2] *(Title V Condition II.B2.7 / ATC C-11-76, -77, and -78 Condition 8)*

Rule 2.21, Requirement #7 (Permit Condition) – Internal Floating Roof Viewing Ports

All internal floating roof tanks shall be equipped with at least three (3) viewing ports. The viewports shall be installed on the fixed roof an equidistance apart and in such a manner so that each viewport provides an unobstructed view of the tank wall and roof seal. An alternate number or size of viewports may be approved at the discretion of the APCO. [District Rule 2.21, §303.3] *(Title V Condition II.B2.8 / ATC C-11-76, -77, and -78 Condition 9)*

Rule 2.21, Requirement #8 – Support Column and Well Covers or Sleeves

Section 305.1(a) requires that all fixed roof columns and wells be equipped with either covers or flexible sleeves.

Permit Condition for P-66-93(a2) [Tank #16] and P-45-94(a3) [Tank #18]

Fixed roof support columns and wells shall be equipped with a sliding gasketed cover or with a flexible fabric sleeve. [District Rule 2.21, §305.1(a)] *(Title V Condition II.B2.9 / ATC C-11-76 and -77 Condition 10)*

Streamlining Demonstration for P-54-93(a5) [Tank #15]: The gasketed cover requirements for internal floating roof columns have been streamlined with the requirements of 40 CFR Part 63.1063(b)(3) (and by reference with the requirements of 40 CFR Part 63.11087(a)).

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(3) (see Rule Requirement #4 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart BBBB)

Streamlined Permit Condition for P-54-93(a5) [Tank #15]

The six columns shall each be equipped with a pole wiper and a gasketed cover. The gap between the pole wiper and the column shall be added to the gaps measured to determine compliance with the secondary seal requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling.

[District Rule 2.21, §305.1(a), District Rule 3.4, 40 CFR Part 63.1063(b)(3), and 40 CFR Part 63.11087(a)] *(Title V Condition II.B5.8 / ATC C-11-78 Condition 10)*

Rule 2.21, Requirement #9 – Ladder Well Gasketed Cover

Section 305.1(b) requires that the ladder wells be equipped with gasketed covers that are closed at all times with no visible gaps, except when the well must be opened for access.

Streamlining Demonstration: The ladder well gasketed cover requirements of Section 305.1(b) have been streamlined with the requirements of 40 CFR Part 63.1063(b)(3) (and by reference with the requirements of 40 CFR Part 63.11087(a)).

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(3) (see Rule Requirement #4 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart BBBB))

Streamlined Permit Condition

Ladder wells shall be equipped with a gasketed cover. The cover shall be closed at all times, with no visible gaps, except when the well must be opened for access. [District Rule 2.21, §305.1(b), 40 CFR Part 63.1063(b)(3), and 40 CFR Part 63.11087(a)] *(Title V Condition II.B2.10 / ATC C-11-76, -77, and -78 Condition 11)*

Rule 2.21, Requirement #10 – Slotted and Solid Guidepole

Section 305.2(c) requires that slotted and unslotted (solid) guidepoles and gauging wells comply with the requirements of Section 305.2(h).

Streamlining Demonstration: The guidepole cover requirements of Section 305.2(c) have been streamlined with the requirements of 40 CFR Part 63.1063(b)(5) (and by reference with the requirements of 40 CFR Part 63.11087(a)). The conditions have also been streamlined with the requirements of District Rule 3.4 that tailors the condition to reflect the specific equipment of each affected tank.

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(5) (see Rule Requirement #6 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart BBBB))

Streamlined Permit Condition for P-54-93(a5) [Tank #15]

The slotted gauging well shall be equipped with a float, sleeve, and wiper seals designed to minimize the gap between the float and the well, and provide for no gap greater than 1/8 inch. The gap between the pole wiper and the guidepole shall be added to the gaps measured to determine compliance with the secondary seal

requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling. [District Rule 2.21, §305.2(c), District Rule 3.4, 40 CFR Part 63.1063(b)(3), and 40 CFR Part 63.11087(a)] *(Title V Condition II.B5.9 / ATC C-11-76 Condition 12)*

Streamlined Permit Condition for P-66-93(a2) [Tank #16] (pole wiper/gasket cover)

Solid sampling or gauging wells, and similar fixed projections through the floating roof such as an anti-rotational pole or column, shall be equipped with a pole wiper and a gasketed cover, seal, or lid which shall be in a closed position at all times except when the well is in use. The gap between the pole wiper and the guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling. [District Rule 2.21, §305.2(c), District Rule 3.4, 40 CFR Part 63.1063(b)(3), and 40 CFR Part 63.11087(a)/C-02-217, C-02-218, and C-11-77] *(Title V Condition II.B5.2 / ATC C-11-77 Condition 12)*

Streamlined Permit Conditions for P-66-93(a2) [Tank #16] (float and wiper seals)

The slotted sampling or gauging wells shall be equipped with float and wiper seals designed to minimize the gap between the float and the well, and provide for no gap greater than 1/8 inch. The gap between the pole wiper and guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling. [District Rule 2.21, §305.2(c), District Rule 3.4, 40 CFR Part 63.1063(b)(3), and 40 CFR Part 63.11087(a)/C-02-217, C-02-218, and C-11-77] *(Title V Condition II.B5.3 / ATC C-11-77 Condition 13)*

Streamlined Permit Condition for P-45-94(a3) [Tank #18]

Each opening through the deck of the floating roof for a slotted guidepole shall be equipped with a deck cover, a pole wiper and pole float. The deck cover shall also be equipped with a gasket between the cover and deck. The wiper or seal of the pole float shall be at or above the height of the pole wiper. [District Rule 2.21, §305.2(c), 40 CFR Part 63.1063(b)(5), and 40 CFR Part 63.11087(a)] *(Title V Condition II.B5.11 / ATC C-11-78 Condition 12)*

Rule 2.21, Requirement #11 – Other Deck Fittings (Vacuum Breaker and Rim Vents, etc.)

Section 305.1(d) requires that “other deck fittings” not previously listed in Section 305.1(a), (b) or (c), comply with the requirements of Sections 305.2(b), 305.2(c), and 305.2(g) (discussed below).

Permit Condition

See Rule Requirements #12, #13, and #14 below.

Rule 2.21, Requirement #12 – Vacuum Breaker Vents

Section 305.2(b) requires:

“Vacuum breakers shall be equipped with a gasket, with no visible gaps, and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.”

Streamlining Demonstration: The vacuum breaker vent (e.g., automatic bleeder vent) requirements of Section 305.2(b) (and by reference Section 305.1(d)) have been streamlined with the requirements of 40 CFR Part 63.1063(b)(4) (and by reference with the requirements of 40 CFR Part 63.11087(a)).

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(4) (see Rule Requirement #5 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart BBBB))

Streamlined Permit Condition

Vacuum breakers shall be equipped with a gasket, with no visible gaps, and shall be closed at all times when the roof is floating except when:

- a. The roof is being floated off or is being landed on the roof leg supports; or
- b. Required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer’s design. [District Rule 2.21, §305.1(d) & §305.2(b), 40 CFR Part 63.1083(b)(4), and 40 CFR Part 63.11087(a)] *(Title V Condition II.B.2.12 / ATC C-11-76 Condition 14 / ATC C-11-77 Condition 16 / ATC C-11-78 Condition 13)*

Rule 2.21, Requirement #13 – Rim Vent

Section 305.2(c) requires:

“Rim vents shall be equipped with a gasket, with no visible gaps, and shall be set to open only when the roof is being floated off the roof leg supports or at the manufacturer’s recommended setting.”

Streamlining Demonstration: The vacuum breaker vent (e.g., automatic bleeder vent) requirements of Section 305.2(b) (and by reference Section 305.1(d)) have been streamlined with the requirements of 40 CFR Part 63.1063(b)(4) (and by reference with the requirements of 40 CFR Part 63.11087(a)).

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(4) (see Rule Requirement #5 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart BBBB))

Streamlined Permit Condition

Rim vents shall be equipped with a gasket, with no visible gaps, and shall be set to open only when:

- a. The roof is being floated off the roof leg supports; or
- b. At the manufacturer's recommended setting. [District Rule 2.21, §305.1(d) & §305.2(c), 40 CFR Part 63.1063(b)(4), and 40CFR Part 63.11087(a)] (*Title V Condition II.B2.13 / ATC C-11-76 Condition 15 / ATC C-11-77 Condition 17 / ATC C-11-78 Condition 14*)

Rule 2.21, Requirement #14 – Access Hatch and Gauge Float Well Covers

Section 305.2(g) requires:

“Each access hatch and gauge float well shall be equipped with a cover that is gasketed and bolted. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.”

Streamlining Demonstration for P-54-93(a5) [Tank #15]: The float well requirements of Section 305.2(g) have been streamlined with the requirements of 40 CFR Part 63.1063(b)(5) (and by reference with the requirements of 40 CFR Part 63.11087(a)). The condition has also been streamlined with the requirements of District Rule 3.4 that tailors the condition to reflect the specific equipment of this specific tank.

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(3) (see Rule Requirement #4 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart BBBB))

Streamlined Permit Condition for P-54-93(a5) [Tank #15]

The two float wells shall each be equipped with a projection below the liquid surface to prevent entrained organic vapor from escaping from the liquid contents of the tank and shall each be equipped with a gasket and a bolted cover. [District Rule 2.21, §305.1(d) & §305.2(g), District Rule 3.4, 40 CFR Part 63.1063(b)(3), and 40 CFR Part 63.11087(a)/C-11-76] (*Title V Condition II.B5.7 / ATC C-11-76 Condition 16*)

Streamlining Demonstration for P-66-93(a2) [Tank #16] and P-45-94(a3) [Tank #18]: The access hatch and gauge float cover requirements of Section 305.2(g) (and by reference Section 305.1(d)) have been streamlined with the requirements of 40 CFR Part 63.1063(b)(3) (and by reference with the requirements of 40 CFR Part 63.11087(a)).

Related Requirements from Other Rules

40 CFR Part 63.1063(b)(3) (see Rule Requirement #4 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart BBBB))

Streamlined Permit Condition for all Tanks

Each access hatch and gauge float well shall be equipped with a cover that is gasketed and bolted. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access. [District Rule 2.21, §305.1(d) & §305.2(g), 40 CFR Part 63.1063(b)(3), and 40 CFR Part 63.11087(a)] *(Title V Condition II.B2.14 / ATC C-11-76 Condition 17 / ATC C-11-77 Condition 18 / ATC C-11-78 Condition 15)*

Rule 2.21, Requirement #15 (Permit Condition) – Primary and Secondary Seal

There shall be no holes, tears, or openings which allow the emission of organic vapors through the secondary seal. There shall be no holes, tears, or openings in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric. [District Rule 2.21, §306.1] *(Title V Condition II.B2.15 / ATC C-11-76 Condition 18 / ATC C-11-77 Condition 19 / ATC C-11-78 Condition 16)*

Rule 2.21, Requirement #16 (Permit Condition) – Mechanical Shoe Geometry

The geometry of the mechanical shoe shall be such that the gap between the shoe and the storage tank shell shall not exceed twice the seal gap criteria for a vertical length greater than 18 inches. [District Rule 2.21, §306.3] *(Title V Condition II.B2.17 / ATC C-11-76 Condition 19 / ATC C-11-77 Condition 20 / ATC C-11-78 Condition 17)*

Rule 2.21, Requirement #17 (Permit Condition) – Mechanical Shoe Gap Limits

No gap between the storage tank shell and the primary seal shall exceed:

- a. 1-1/2 inch;
- b. 1/2 inch for a cumulative length greater than 10% of the circumference of the tank;
- c. 1/8 inch for a continuous length of more than 10% of the circumference of the tank;
- d. 1/8 inch for a cumulative length greater than 30% of the circumference of the tank. [District Rule 2.21, §306.4] *(Title V Condition II.B2.18 / ATC C-11-76 Condition 20 / ATC C-11-77 Condition 21 / ATC C-11-78 Condition 18)*

Rule 2.21, Requirement #18 – Secondary Seal Design and Gap Limits

Section 306.5 requires that the secondary seal extend from the floating roof to the tank shell and not be attached to the primary seal. The section also establishes specific gap limits for secondary seals installed after March 23, 1995.

Streamlining Demonstration: All three tanks are subject to the secondary seal design and gap limit requirements of the single section. Since the secondary seals of other tanks not affected by this modification may have been installed prior to March 23, 1995, the District will continue to split the requirements of the section into two permit conditions as previously contained in the Title V permit.

Permit Condition (secondary seal design)

The secondary seal shall extend from the floating roof to the storage tank shell and shall not be attached to the primary seal. [District Rule 2.21, §306.5] *(Title V Condition II.B2.20 / ATC C-11-76 Condition 21 / ATC C-11-77 Condition 22 / ATC C-11-78 Condition 19)*

Permit Condition (secondary seal gap limits)

No gap between the storage tank shell and the secondary seal shall exceed:

- a. 0.06 inch;
- b. 0.02 inch for a cumulative length greater than 5% of the circumference of the tank excluding gaps less than 1.79 inches from vertical weld seams. [District Rule 2.21, §306.5] *(Title V Condition II.B2.21 / ATC C-11-76 Condition 22 / ATC C-11-77 Condition 23 / ATC C-11-78 Condition 24)*

Rule 2.21, Requirement #29 (Permit Condition) – Secondary Seal Design Requirements for the Monitoring of Mechanical Shoe Primary Seal

The secondary seal shall allow easy insertion of probes up to 1-1/2 inch in width in order to measure gaps in the primary seal. [District Rule 2.21, §306.7] *(Title V Condition II.B2.23 / ATC C-11-76 Condition 23 / ATC C-11-77 Condition 24 / ATC C-11-78 Condition 21)*

Rule 2.21, Requirement #20 (Permit Condition) – Organic Liquid Storage, Handling, and Disposal

Organic liquids subject to District Rule 2.21 shall not be discarded to public sewers, stored in open containers, or handled in any other manner that would result in evaporation to the atmosphere. [District Rule 2.21, §314] *(Title V Condition II.B2.25 / ATC C-11-76 Condition 25 / ATC C-11-77 Condition 26 / ATC C-11-78 Condition 22)*

Rule 2.21, Requirement #21 (Permit Condition) – Storage Tank Degassing

The degassing of any storage tank shall be controlled by a system which collects and processes all organic vapors and gases and has an abatement efficiency of at least 90% by weight. The system shall be operated until the concentration of volatile organic compounds in the tank is less than 10,000 ppm expressed as methane as determined in accordance with the test method specified in Section 605 of District Rule 2.21. [District Rule 2.21, §315] *(Title V Condition II.B2.26 / ATC C-11-76 Condition 26 / ATC C-11-77 Condition 27 / ATC C-11-78 Condition 23)*

Rule 2.21, Requirement #22 (Permit Condition) – Maintenance Plan Requirement and Submittal

The Permit Holder shall submit a maintenance plan to the APCO at least seven (7) days prior to performing maintenance on any storage tank. The plan shall state the equipment Permit to Operate number (unit identification number), a detailed description of the maintenance to be performed, the expected duration of the maintenance, the reason that the maintenance is necessary, emission control measures that will be employed, and the effect of not performing the maintenance.

[District Rule 2.21, §501] (*Title V Condition II.B2.27 / ATC C-11-76 Condition 27 / ATC C-11-77 Condition 28 / ATC C-11-78 Condition 24*)

Rule 2.21, Requirement #23 (Permit Condition) – Storage Tank Monitoring Notification

The Permit Holder shall submit written notification to the APCO at least seven (7) days prior to performing monitoring on any storage tank. [District Rule 2.21, §502] (*Title V Condition II.C1.1 / ATC C-11-76 Condition 28 / ATC C-11-77 Condition 29 / ATC C-11-78 Condition 25*)

Rule 2.21, Requirement #24 (Permit Condition) – Tank Inspection Using Explosimeter

Section 502.2(a) requires:

“Visually inspect the secondary seal, floating roof, and deck fittings. Use an explosimeter that is calibrated in accordance with the manufacturer’s specifications to measure the lower explosive limit (LEL). Compliance shall be verified every 3 months at a distance of no less than 4 feet from the viewport or access hatch.”

Streamlining Demonstration for the Visual Inspections: The visual inspection requirements of 40 CFR Part 63.1063(c)(1)(i)(A) and 40 CFR Part 63.1063(d)(2) (and by reference 40 CFR Part 63.11092(e)(1)) have been streamlined with the requirements of Section 502.2(a) of District Rule 2.21. The yearly inspection frequency of 40 CFR 63.1063(c)(1)(i)(A) has been subsumed by the more stringent three (3) month inspection frequency of Section 502.2(a) of District Rule 2.21.

Related Requirements from Other Rules

40 CFR Part 63.1063(c)(1)(i)(A) and (d)(2) (see Rule Requirement #9 of 40 CFR Part 63 – Subpart WW)

40 CFR Part 63.11092(e)(1) (see Rule Requirement #3 of 40 CFR Part 63 – Subpart BBBB)

Subsuming Permit Conditions

The Permit Holder shall visually inspect the secondary seal, floating roof, and deck fittings and use an explosimeter that is calibrated in accordance with the manufacturer’s specifications to measure the LEL of the storage tank. For each storage tank, inspections and measurements shall be completed at least once every three (3) months at a distance of no less than (4) feet from the storage tank viewport or access hatch. Any of the conditions described in 40 CFR Part 63.1063(d)(1)(i) through (d)(1)(iv) shall constitute an inspection failure. Identification of holes or tears in the rim seal is required only for the seal that is visible from the top of the storage vessel. [District Rule 2.21, §502.2(a), 40 CFR Part 63.1063(c)(1)(i)(A) and (d)(2), and 40 CFR Part 63.11092(e)(1)] (*Title V Condition II.C1.2 / ATC C-11-76 Condition 29 / ATC C-11-77 Condition 30 / ATC C-11-78 Condition 26*)

Rule 2.21, Requirement #25 – Frequency of Primary and Secondary Seal Gap Measurement

Section 502.2(b) requires that:

“After March 23, 1995, perform complete gap measurements of the primary and secondary seals every 10 years and each time the tank is emptied and degassed.”

Streamlining Demonstration: All three tanks are subject to the primary and secondary seal gap measuring frequency of this section. However, the District also requires that the gaps be measured every time a tank is emptied and degassed. As such, the District will continue to split the requirements of the section into two permit conditions (as previously contained in the Title V permit and local permits).

Subsuming Demonstration for P-54-93(a5) [Tank #15] and P-66-93(a2) [Tank #16]: The emptying and degassing frequency of Section 502.2(b) and 40 CFR Part 63.1063(c)(1)(i)(B) have been subsumed by the more stringent frequency requirement of Rule 3.4. The subsuming condition requires that the tanks be emptied and degassed (and gap measurements performed and completed) at least once every 60 months instead of once every 10 years. The condition specifies that the inspections be conducted in accordance with the procedures of 40 CFR Part 63.1063(c)(1)(i)(B).

Subsuming Demonstration for P-45-94(a3) [Tank #18]: The inspection provisions of 40 CFR Part 63.1063(c)(1)(i)(B) have been streamlined with the inspection requirements of Section 502.2(b).

Related Requirements from Other Rules

40 CFR Part 63.1063(c)(1)(i)(B) and (d)(2) (see Rule Requirement #7 of 40 CFR Part 63 – Subpart WW)

40 CFR Part 63.11092(e)(1) (see Rule Requirement #3 of 40 CFR Part 63 – Subpart BBBB)

Subsuming Permit Condition for P-54-93(a5) [Tank #15] and P-66-93(a2) [Tank #16]

The Permit Holder shall conduct actual gap measurements of the primary seal and secondary seal at least once every 60 months. The Permit Holder shall also perform an inspection in accordance with the procedures contained in 40 CFR Part 63.1063(d)(1). [District Rule 2.21, §502.2(b), District Rule 3.4, 40 CFR Part 63.1063(c)(1)(i)(B), 40 CFR Part 63.11092(e)(1)/C-11-76 and C-11-77] (*Title V Condition II.C3.2 / ATC C-11-76 Condition 30 / ATC C-11-77 Condition 30*)

Subsuming Permit Condition for P-45-93(a3) [Tank #18]

The Permit Holder shall perform complete gap measurements of the primary and secondary seals at least once every ten (10) years. The Permit Holder shall also perform an inspection in accordance with the procedures contained in 40 CFR Part 63.1063(d)(1). [District Rule 2.21, §502.2(b), District Rule 3.4, 40 CFR Part 63.1063(c)(1)(i)(B), and 40 CFR Part 63.11092(e)(1)] *(Title V Condition II.C1.3 / ATC C-11-78 Condition 27)*

Streamlined Permit Condition All Tanks

The Permit Holder shall perform complete gap measurements of the primary and secondary seals each time the tank is emptied and degassed. The Permit Holder shall also perform an inspection in accordance with the procedures contained in 40 CFR Part 63.1063(d)(1). [District Rule 2.21, §502.2(b), 40 CFR Part 63.1063(c)(1)(i)(B), and 40 CFR Part 63.11092(e)(1)] *(Title V Condition II.C1.4 / ATC C-11-76 Condition 31 / ATC C-11-77 Condition 32 / ATC C-11-78 Condition 28)*

Rule 2.21, Requirement #26 – Frequency of Deck Fitting Gas Measurement

Section 502.2(c) requires that:

“After March 23, 1995, perform complete gap measurements of all deck fittings every 10 years and each time the tank is emptied and degassed.”

Streamlining Demonstration: The inspection provisions of 40 CFR Part 63.1063(c)(1)(i)(B) have been streamlined with the deck fitting gap measurement requirements of Section 502.2(c).

Related Requirements from Other Rules

40 CFR Part 63.1063(c)(1)(i)(B) (see Rule Requirement #7 of 40 CFR Part 63 – Subpart WW)

40 CFR Part 63.11092(e)(1) (see Rule Requirement #3 of 40 CFR Part 63 – Subpart BBBBBB)

Streamlined Permit Condition

The Permit Holder shall perform complete gap measurements of all deck fittings at least once every ten (10) years and each time the tank is emptied and degassed. The Permit Holder shall also perform an inspection in accordance with the procedures contained in 40 CFR Part 63.1063(d)(1). [District Rule 2.21, §502.2(c), 40 CFR Part 63.1063(c)(1)(i)(B), and 40 CFR Part 63.11092(e)(1)] *(Title V Condition II.C1.5 / ATC C-11-76 Condition 32 / ATC C-11-77 Condition 33 / ATC C-11-78 Condition 29)*

Rule 2.21, Requirement #27 (Permit Condition) – Inspection Report Format

The Permit Holder shall conduct all visual inspections, LEL measurements, and gap measurements in accordance with the District-approved report format. [District Rule 2.21, §502.2] *(Title V Condition II.C1.6 / ATC C-11-76 Condition 33 / ATC C-11-77 Condition 34 / ATC C-11-78 Condition 30)*

Rule 2.21, Requirement #28 (Permit Condition) – Submittal of All Monitoring Reports

The Permit Holder shall submit all monitoring reports to the APCO within 45 calendar days after the monitoring work is completed. All monitoring reports shall include sufficient detail to verify compliance with all applicable requirements of District Rule 2.21. [District Rule 2.21, §503.1] *(Title V Condition II.C1.7 / ATC C-11-76 Condition 34 / ATC C-11-77 Condition 35 / ATC C-11-78 Condition 31)*

Rule 2.21, Requirement #29 (Permit Condition) – Throughput Report Submittal

The Permit Holder shall submit throughput reports to the APCO no later than March 31 for the previous calendar year. Storage tank throughput reports shall include the actual quarterly volume of organic liquid transferred into each tank. Bulk loading throughput reports shall include the actual quarterly volume of organic liquid transferred. [District Rule 2.21, §503.3] *(Title V Condition II.D1.1 / ATC C-11-76 Condition 35 / ATC C-11-77 Condition 36 / ATC C-11-78 Condition 32)*

Rule 2.21, Requirement #30 – Compliance Record Requirements

Section 504 requires that the source maintain accurate records to demonstrate compliance in accordance with the requirements of Sections 501, 502, and 503 on site for a period of at least five (5) years and make such records available to the APCO upon request.

Streamlining Demonstration: The recordkeeping requirements of 40 CFR Part 63.1065 (and by reference 40 CFR Part 63.11094(a)) have been streamlined with the requirements of Section 504 of District Rule 2.21.

Related Requirements from Other Rules

40 CFR Part 63.1065 (see Rule Requirement #9 of 40 CFR Part 63 – Subpart WW)
40 CFR Part 63.11094(a) (see Rule Requirement #7 of 40 CFR Part 63 – Subpart BBBB)

Streamlined Permit Condition

The Permit Holder shall maintain accurate records to demonstrate compliance in accordance with the requirements of Sections 501, 502, and 503 of District 2.21, the requirements of Section 502 and 503 of District Rule 2.23, and the requirements of 40 CFR Part 63.1065, on site for a period of at least five (5) years and make such records available to the APCO upon request. [District Rule 2.21, §504, 40 CFR Part 63.1065, and 40 CFR Part 63.11094(a)] *(Title V Condition II.D1.2 / ATC C-11-76 Condition 36 / ATC C-11-77 Condition 37 / ATC C-11-78 Condition 33)*

E. District Rule 2.23 – Fugitive Hydrocarbon Emissions

Rule Description

This rule specifies requirements for the control of fugitive hydrocarbon emissions from oil and gas production and processing facilities, refineries, chemical plants, gasoline terminals, and pipeline transfer stations in conformance with Reasonably Available Control Technology determinations approved by CARB to meet the requirements of the California Clean Air Act.

Compliance Status

The rule applies to all equipment components associated with the storage and transfer of gasoline. Section 102 - Applicability specifically lists gasoline terminals, but makes no mention of diesel or ethanol terminals. Therefore, all equipment components associated with the storage and transfer of diesel and ethanol are not subject to this rule. The source is currently in compliance with the rule. The version of the rule used in this evaluation was adopted on August 13, 1997 and is part of the current California SIP.

Rule 2.23, Requirement #1 (Permit Condition) – Pump and Compressor Seals

All pump seals, compressor seals, and pressure relief devices shall be inspected for leaks once during every manned operating shift or every eight-hour period. A leak shall include any liquid leak, a visual vapor leak, audible leaks, the presence of bubbles using soap solutions, or a leak identified by a vapor analyzer. [District Rule 2.23, §301.1(a)] (*Title V Condition II.B3.1 / ATC C-11-76 Condition 41 / ATC C-11-77 Condition 42 / ATC C-11-78 Condition 38*)

Rule 2.23, Requirement #2 (Permit Condition) – Emission Rate Quantification for Leaks

Any leak which is identified during the inspection of components shall be measured to quantify emission concentrations according to EPA Reference Method 21. [District Rule 2.23, §301.1(b)] (*Title V Condition II.B3.2 / ATC C-11-76 Condition 42 / ATC C-11-77 Condition 43 / ATC C-11-78 Condition 39*)

Rule 2.23, Requirement #3 (Permit Condition) – Quarterly Component Inspections

All components shall be inspected quarterly according to EPA Reference Method 21, except as provided below:

- a. All inaccessible components shall be inspected annually according to EPA Reference Method 21.
- b. All threaded connections and flanges shall be inspected for leaks according to EPA Reference Method 21 immediately after being placed in service and annually thereafter.
- c. The inspection frequency for components, except pump seals and compressor seals, may change from quarterly to annually, provided that all of the following conditions are met:
 1. All components at the facility have been successfully operated and maintained with no liquid leaks and no major gas leaks exceeding 0.5

- percent of the total components inspected per inspection period for twelve consecutive months, and
2. The above is substantiated by documentation and written approval obtained from the APCO.
 - d. Any annual inspection frequency approved by the APCO shall revert to quarterly, should any liquid leak or major gas leak be detected exceeding 0.5 percent of the total components inspected per inspection period. [District Rule 2.23, §301.2, §301.3, §301.5, §301.6, & §301.8] (*Title V Condition II.B3.3 / ATC C-11-76 Condition 43 / ATC C-11-77 Condition 44 / ATC C-11-78 Condition 40*)

Rule 2.23, Requirement #4 (Permit Condition) – Major and Critical Components

A pressure relief device shall be inspected according to EPA Reference Method 21 within three (3) calendar days after every pressure relief. [District Rule 2.23, §301.4] (*Title V Condition II.B3.4 / ATC C-11-76 Condition 45 / ATC C-11-77 Condition 46 / ATC C-11-78 Condition 42*)

Rule 2.23, Requirement #5 (Permit Condition) – Leaking Component Tagging

All leaking components shall be affixed with brightly colored, weatherproof tags showing the date of leak detection. These tags shall remain in place until the components are repaired and reinspected. [District Rule 2.23, §301.7] (*Title V Condition II.B3.5 / ATC C-11-76 Condition 46 / ATC C-11-77 Condition 47 / ATC C-11-78 Condition 43*)

Rule 2.23, Requirement #6 (Permit Condition) – Repair Periods

Section 302.1(a) establishes the allowable repair or replacement time periods for all leaks from non-critical components.

Subsuming Demonstration for Final Leak Repairs: The final repair or replacement deadline requirements of Section 302.1(a) subsume the less stringent final repair deadlines of 40 CFR Part 63.11089(c).

Streamlining Demonstration for Semi-Annual Reporting: The requirements of 40 CFR Part 63.11089(d) that require a source to list in the semi-annual report the reasons why repairs were delayed have streamlined with the requirements of Section 302.1(a).

Related Requirements from Other Rules

40 CFR Part 63.11089(c) (see Rule Requirement #9 of 40 CFR Part 63 - Subpart BBBBBB)

40 CFR Part 63.11089(d) (see Rule Requirement #10 of 40 CFR Part 63 - Subpart BBBBBB)

Subsuming Permit Condition

All non-critical components shall be successfully repaired or replaced within the following time periods after detection of the leak (as defined in District Rule 2.23, Fugitive Hydrocarbon Emissions) according to the table below:

Table 1: Leak Repair Time Periods

Type of Leak	Leak Level Concentration, [c]	Time Period ¹
Minor Gas Leak	1,000 ppm ≤ [c] < 10,000 ppm	14 Days
Major Gas Leak	10,000 ppm ≤ [c] < 50,000 ppm	5 Days
Major Gas Leak over 50,000 ppm	50,000 ppm ≤ [c]	1 Day ²
Minor Liquid Leak	Visible mist or dripping liquid at a rate of three drips per minute or more	2 Day ²
Major Liquid Leak	Visible mist or continuous flow of liquid	1 Days ²

1. Day means a 24 hour period from the time of leak detection.
2. Unless prohibited by California Occupational Safety and Health Administration (CAL OSHA) standards.

The Permit Holder shall provide in the semiannual report specified in 40 CRR Part 63.11095(b), the reason(s) why the repair was not feasible by the required time period and the date each repair was completed. [District Rule 2.23, §302.1(a) and 40 CFR Part 63.11089(c) & (d)] *(Title V Condition II.B3.6 / ATC C-11-76 Condition 47 / ATC C-11-77 Condition 48 / ATC C-11-78 Condition 44)*

Rule 2.23, Requirement #7 (Permit Condition) – Leak Minimization

Section 302.1(b) requires that all leaks be immediately minimized to stop or reduced leakage to the atmosphere.

Subsuming Demonstration: The leak minimization requirements of Section 302.1(b) subsume the less stringent requirements of 40 CFR Part 63.11089(c) (which allows up to five (5) days for the minimization of leaks once detected).

Related Requirements from Other Rules

40 CFR Part 63.11089(c) (see Rule Requirement #9 of 40 CFR Part 63 - Subpart BBBBBB)

Subsuming Permit Condition

Leaks from components shall be immediately minimized to stop or reduce leakage to the atmosphere. [District Rule 2.23, §302.1(b) and 40 CFR Part 63.11089(c)] *(Title V Condition II.B3.7 / ATC C-11-76 Condition 48 / ATC C-11-77 Condition 49 / ATC C-11-78 Condition 45)*

Rule 2.23, Requirement #8 (Permit Condition) – Component Replacement

All leaks from critical components shall be minimized to the extent possible and shall be replaced with Best Available Control Technology equipment as determined in accordance with District Rule 3.4, NEW SOURCE REVIEW, during the next process unit turnaround. [District Rule 2.23, §302.1(c)] (*Title V Condition II.B3.8 / ATC C-11-76 Condition 49 / ATC C-11-77 Condition 50 / ATC C-11-78 Condition 51*)

Rule 2.23, Requirement #9 (Permit Condition) – Re-Inspection of Repair or Replaced Component

All repaired or replaced components shall be re-inspected per EPA Reference Method 21 by the Permit Holder within 30 days of the repair or replacement. [District Rule 2.23, §302.2] (*Title V Condition II.B3.9 / ATC C-11-76 Condition 50 / ATC C-11-77 Condition 51 / ATC C-11-78 Condition 47*)

Rule 2.23, Requirement #10 (Permit Condition) - Component Replacement with BACT

A component or parts which incur five repair actions for a liquid or major gas leak within a continuous twelve-month period shall be replaced with Best Available Control Technology equipment as determined in accordance with District Rule 3.4, NEW SOURCE REVIEW. [District Rule 2.23 §302.3] (*Title V Condition II.B3.10 / ATC C-11-76 Condition 51 / ATC C-11-77 Condition 52 / ATC C-11-78 Condition 48*)

Rule 2.23, Requirement #11 (Permit Condition) - Open-Ended Lines and Valves

Open-ended lines and valves located at the end of lines shall be sealed with a blind flange, plug, cap, or a second closed valve at all times except during operations. Operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs. [District Rule 2.23, §303] (*Title V Condition II.B3.11 / ATC C-11-76 Condition 52 / ATC C-11-77 Condition 53 / ATC C-11-78 Condition 49*)

Rule 2.23, Requirement #12 (Permit Condition) - Hatches

Hatches shall be closed at all times except during sampling, adding process materials, or attended maintenance operations. [District Rule 2.23, §304] (*Title V Condition II.B3.12 / ATC C-11-76 Condition 53 / ATC C-11-77 Condition 54 / ATC C-11-78 Condition 50*)

Rule 2.23, Requirement #13 (Permit Condition) – Prohibition of Pressure Relief Device Use

The Permit Holder shall not use a pressure relief device on any equipment if the concentration of volatile organic compounds and methane in such a device exceeds 100 ppm (expressed as methane) above background. [District Rule 2.23, §305.2] (*Title V Condition II.B3.13 / ATC C-11-76 Condition 44 / ATC C-11-77 Condition 45 / ATC C-11-78 Condition 41*)

Rule 2.23, Requirement #14 (Permit Condition) - Replacement of Non-Repairable Pressure Relief Devices

Section 350.3 required that during the next “process unit turnaround,” the source replace a non-repairable pressure relief device with a device that meets the requirements of District Rule 2.23, Section 305.2.

Permit Condition

No condition required.

Rule 2.23, Requirement #15 (Permit Condition) – Replacement of Inaccessible Pressure Relief Devices

Section 350.4 required that during the next “process unit turnaround,” the source replace all inaccessible pressure relief device with a device that meets the requirements of District Rule 2.23, Section 305.2.

Permit Condition

No condition required.

Rule 2.23, Requirement #16 (Permit Condition) – Major and Critical Components

All major components and critical components shall be clearly and visibly physically identified for inspection, repair, replacement, and record-keeping purposes. [District Rule 2.23, §401.1] (*Title V Condition II.B3.16 / ATC C-11-76 Condition 54 / ATC C-11-77 Condition 55 / ATC C-11-78 Condition 51*)

Rule 2.23, Requirement #17 (Permit Condition) – Major, Critical, and Inaccessible Component Identification on Diagrams

All major, critical, and inaccessible components except flanges and threaded connections shall be clearly identified in diagrams for inspection, repair, replacement, and record-keeping purposes as approved by the APCO. [District Rule 2.23, §401.2] (*Title V Condition II.B3.17 / ATC C-11-76 Condition 55 / ATC C-11-77 Condition 56 / ATC C-11-78 Condition 52*)

Rule 2.23, Requirement #18 (Permit Condition) – Major and Critical Components

The information required for component identification shall be submitted to the APCO upon request. [District Rule 2.23, §401.3] (*Title V Condition II.B3.18 / ATC C-11-76 Condition 56 / ATC C-11-77 Condition 57 / ATC C-11-78 Condition 53*)

Rule 2.23, Requirement #19 (Permit Condition) – Notification of Major Component Information Change

The Permit Holder shall notify the APCO in writing of any change in the identification of a major component. [District Rule 2.23, §401.4] (*Title V Condition II.B3.19 / ATC C-11-76 Condition 57 / ATC C-11-77 Condition 58 / ATC C-11-78 Condition 54*)

Rule 2.23, Requirement #20 (Permit Condition) – Record-Keeping Retention

All records of operator inspection and repair shall be maintained at the facility for the previous five (5) year period and made available at the time of District inspection. [District Rule 2.23, §501] (*Title V Condition II.D2.1 / ATC C-11-76 Condition 58 / ATC C-11-77 Condition 59 / ATC C-11-78 Condition 55*)

Rule 2.23, Requirement #21 – Inspection Log Requirements

Section 502 requires that the Permit Holder maintain a log book with all of the required component and inspection information.

Streamlining Demonstration: The inspection diagram requirements of Section 502 has been streamlined with the applicable requirements 40 CFR Part 63.11089(c) and 40 CFR Part 63.11094(e).

Related Requirements from Other Rules

40 CFR Part 63.11089(c) (see Rule Requirement #9 of 40 CFR Part 63 - Subpart BBBBBB)

40 CFR Part 63.11094(e) (see Rule Requirement #11 of 40 CFR Part 63 - Subpart BBBBBB)

Streamlined Permit Condition

The Permit Holder shall maintain an inspection log, containing at a minimum, the following:

- a. Equipment identification number (name), location, type of component, and description of any unit where leaking components are found;
- b. The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, and/or smell);
- c. The date the leak was detected, the date of each attempt to repair the leak and the method(s) used in each attempt, and the corresponding leak emission level (in ppm);
- d. "Repair delayed" and the reason for the delay if the leak is not repaired within the allowable time period after discovery of the leak;
- e. The expected date of successful repair of the leak if the leak is not repaired within the allowable time period;
- f. The date of successful repair of the leak;
- g. Date and emission level (in ppm) of the recheck after the leak is repaired; and
- h. Total number of components inspected and a total number and percentage of leaking components found by component types. [District Rule 2.23, §502, 40 CFR Part 63.11089(c), and 40 CFR Part 63.11094(e)] (*Title V Condition II.D2.2 / ATC C-11-76 Condition 59 / ATC C-11-77 Condition 60 / ATC C-11-78 Condition 56*)

Rule 2.23, Requirement #22 (Permit Condition) – Leaks Detection Records

Records of leaks detected by a quarterly or annual operator inspection, and each subsequent repair and reinspection, shall be submitted to the APCO upon request. [District Rule 2.23, §503] (*Title V Condition II.D2.3 / ATC C-11-76 Condition 60 / ATC C-11-77 Condition 61 / ATC C-11-78 Condition 57*)

F. District Rule 3.1 – General Permit Requirements

Rule Description

This rule provides an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of operating permits.

Compliance Status

The source is currently in compliance with the rule. The version of the rule used in this evaluation is the rule adopted on February 23, 1994, and is part of the California SIP. For reference, Page 67068 of the Federal Register, Vol. 69, No. 220 documents that the SIP approved version of Rule 3.1 was "deleted without replacement Rule 3.1, paragraphs 403 and 406." No part of the proposed Title V permit has references to either Section 403 (dealing with Denial of Applications) or Section 406 (dealing with Appeals).

Rule 3.1, Requirement #1 (Permit Condition) – Authority to Construct

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1] *(Title V Condition IV.H.1)*

Rule 3.1, Requirements #2-3 (Permit Conditions) – Permit to Operate

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1, §302.1] *(Title V Condition IV.H.2)*

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1, §302.2] *(Title V Condition IV.H.3)*

Rule 3.1, Requirement #4 (Permit Condition) – Information

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule

for return to required operating conditions. [District Rule 3.1, §405.3] *(Title V Condition IV.H.4)*

G. District Rule 3.4 – New Source Review

Rule Description

This rule provides a procedure for the review for new and modified stationary emission units.

Compliance Status

The source is currently subject to the requirements of the rule. The version of the rule used in this evaluation is the rule adopted on December 11, 1996, and is part of the California SIP.

Rule 3.4, Requirement #1 (Permit Conditions) – Permitted Emission Limits

The VOC emissions from P-54-93(a5) [Tank #15] shall not exceed 826 lb/1st calendar quarter, 454 lb/2nd calendar quarter, 490 lb/3rd calendar quarter, 863 lb/4th calendar quarter, and 1.31 tons/year. [District Rule 3.4/C-11-77] *(Title V Condition II.A.10)*

The VOC emissions from P-66-93(a2) [Tank #16] shall not exceed 696 lb/1st calendar quarter, 364 lb/2nd calendar quarter, 396 lb/3rd calendar quarter, 728 lb/4th calendar quarter, and 1.09 tons/year. [District Rule 3.4/C-11-77] *(Title V Condition II.A.11)*

The VOC emissions from P-45-94(a3) [Tank #18] shall not exceed 948 lb/1st calendar quarter, 501 lb/2nd calendar quarter, 544 lb/3rd calendar quarter, 991 lb/4th calendar quarter, and 1.50 tons/year. [District Rule 3.4/C-11-78] *(Title V Condition II.A.13)*

Rule 3.4, Requirement #2 (Permit Condition) – Permitted Process Limits

For P-54-93(a5) [Tank #15], the amount of gasoline transferred shall not exceed 29.93 million gallons/1st calendar quarter, 30.27 million gallons/2nd calendar quarter, 30.60 million gallons/3rd calendar quarter, 30.60 million gallons/4th calendar quarter, and 121.40 million gallons/year. [District Rule 3.4/C-11-76] *(Title V Condition II.B1.10)*

For P-66-93(a2) [Tank #16], the amount of gasoline transferred shall not exceed 6.45 million gallons/1st calendar quarter, 6.56 million gallons/2nd calendar quarter, 6.60 million gallons/3rd calendar quarter, 6.60 million gallons/4th calendar quarter, and 26.17 million gallons/year. [District Rule 3.4/C-11-77] *(Title V Condition II.B1.11)*

For P-45-94(a3) [Tank #18], the amount of gasoline transferred shall not exceed 14.79 million gallons/1st calendar quarter, 14.96 million gallons/2nd calendar quarter, 15.12 million gallons/3rd calendar quarter, 15.12 million gallons/4th calendar quarter,

and 60.00 million gallons/year. [District Rule 3.4/C-11-78] (Title V Condition II.B1.13)

Rule 3.4, Requirement #3 (Permit Conditions) – Best Available Control Technology (BACT)

Per the requirements of Section 301, ATC applications C-11-76 [Tank #15] and C-11-78 [Tank #18] trigger BACT requirements for VOC since the calculated daily emission limits for each tank are above the 10 lb/day BACT trigger level for VOC, and the modifications result in an increase in each tank's permitted quarterly potential to emit (see attached emission evaluations for calculations).

As documented in attached BACT Determinations BACT-623-1 for Tank #15 and BACT-623-2 for Tank #18, the cost of installing additional controls on the tank are not cost effective. As such, the District considers BACT for this project to be the continued use of an internal floating steel roof in compliance with the provisions of District Rule 2.21 (Organic Liquid Storage and Transfer).

Rule 3.4, Requirement #4 (Permit Condition) – Emission Offset Requirements (General)

Per the requirements of Section 302.1, ATC applications C-11-76 [Tank #15], C-11-77 [Tank #16], and C-11-78 [Tank #18] each require that the source provide emission offsets for VOC in the 1st and 4th calendar quarters, since the modified emission units result in an increase potential to emit for each unit, and the total potential to emit for the stationary source is above the VOC offset trigger level of 7,500 pounds per quarter.

As calculated in the attached emission evaluations, the tanks will require the following amounts of emission reduction credits (ERCs) using the location ratios contained in Section 303. Since the proposed modifications are considered "non-major modifications" (over 25 tons), the following apply:

ATC Permit Conditions Only (listed here for reference only)

The following quantity of Emission Reduction Credits (ERCs) shall be surrendered to the District prior to beginning construction as authorized by ATCs C-11-76, C-11-77, and C-11-78:

Table 2: ERCs generated on-site

VOC ERCs generated on-site (1.0 to 1.0 Ratio)					
ATC	Emissions Unit	Qtr #1 (Jan 1-Mar 31) [lb]	Qtr #2 (Apr 1-June 30) [lb]	Qtr #3 (July 1-Sept 30) [lb]	Qtr #4 (Oct 1-Dec 31) [lb]
C-11-76	Tank #15	140	0	0	147
C-11-77	Tank #16	128	0	0	134
C-11-78	Tank #18	107	0	0	110

Table 3: ERCs generated within 15-mile radius

VOC ERCs generated within 15-mile radius (1.2 to 1.0 Ratio)					
ATC	Emissions Unit	Qtr #1 (Jan 1-Mar 31) [lb]	Qtr #2 (Apr 1-June 30) [lb]	Qtr #3 (July 1-Sept 30) [lb]	Qtr #4 (Oct 1-Dec 31) [lb]
C-11-76	Tank #15	168	0	0	176
C-11-77	Tank #16	154	0	0	161
C-11-78	Tank #18	128	0	0	132

Table 4: ERCs generated greater than 15-miles, but within a 50-mile radius

VOC ERCs generated greater than 15-miles, but within a 50-mile radius (1.5 to 1.0 Ratio)					
ATC	Emissions Unit	Qtr #1 (Jan 1-Mar 31) [lb]	Qtr #2 (Apr 1-June 30) [lb]	Qtr #3 (July 1-Sept 30) [lb]	Qtr #4 (Oct 1-Dec 31) [lb]
C-11-76	Tank #15	210	0	0	221
C-11-77	Tank #16	192	0	0	201
C-11-78	Tank #18	161	0	0	165

[District Rule 3.4]

Rule 3.4, Requirement #5 (Permit Condition) – Major Modification

The three applications do not meet the definition of Major Modification (contained in Section 221 of the rule) since the calculated increase in potential to emit for the stationary source in the last five (5) years does not exceed 25 tons of VOC (see attached emission evaluations).

Rule 3.4, Requirement #8 (Permit Condition) – Primary Seal Installation of Tank #15 and Tank #16

The primary seal shall be installed so that one end of the shoe extends into the stored liquid. [District Rule 3.4/C-02-217, C-02-218, C-11-76, C-11-77, C-02-128, C-02-127, and C-02-126] *(Title V Condition II.B5.4 / ATC C-11-76 Condition 24 / ATC C-11-77 Condition 25)*

Rule 3.4, Requirement #9 (Permit Condition) – Adjustable Roof Leg Vapor Seal Boots of Tank #15 and Tank #16

The tank shall have vapor seal boots (or equivalent) on the adjustable roof legs. [District Rule 3.4/C-11-76 and C-11-77] *(Title V Condition II.B5.10 / ATC C-11-76 Condition 13 / ATC C-11-77 Condition 14)*

Rule 3.4, Requirement #10 (Permit Condition) – Tank Roof Opening of Tank #16

All openings in the tank roof (except for the mechanical vacuum breaker) shall be provided with a projection below the liquid surface to prevent entrained organic vapor from escaping from the liquid contents of the tank. The tank shall have no ungasketed roof penetrations. [District Rule 3.4/C-02-217, C-02-218, and C-11-77] *(Title V Condition II.B5.5 / ATC C-11-77 Condition 15)*

Rule 3.4, Requirement #11 (Permit Condition) – RVP Limitations by Calendar Month for Tank #15, “Tank #6, and Tank #18

The tank shall only be used to store gasoline with a Reid Vapor Pressure (RVP) less than or equal to the values listed in Table 6, as determined by the test methods specified in Section 600 of District Rule 2.21, ORGANIC LIQUID AND STORAGE.

Table 5: RVP Limitations by Calendar Month

	January 1 – February 28	March 1 – March 31	April 1 - September 30	October 1 - October 31	November 1 – December 31
RVP	15.0 psia	13.0 psia	7 psia	13.0 psia	15 psia

[District Rule 3.4/C-11-76, C-11-77, and C-11-78] *(Title V Condition II.B5.6 / ATC C-11-76 Condition 38 / ATC C-11-77 Condition 39 / ATC C-11-78 Condition 34)*

Rule 3.4, Requirement #12 (Permit Condition) – RVP Sampling of Tank #15, Tank #16, and Tank #18

An “all level sample” shall be taken from within the tank at the beginning of the months of March, April, October and November, and upon request by the District. Samples shall be analyzed to determine the RVP. [District Rule 3.4/C-11-76, C-11-77, and C-11-78] *(Title V Condition II.C3.1 / ATC C-11-76 Condition 38 / ATC C-11-77 Condition 39 / ATC C-11-78 Condition 35)*

Rule 3.4, Requirement #13 (Permit Condition) – Records of RVP Sampling Analysis

The Permit Holder shall maintain records of the quarterly RVP sampling analysis. Records shall be maintained for a period of five (5) years and shall be made readily available to the Air Pollution Control Officer upon request. [District Rule 3.4] *(Title V Condition II.D3.3 / ATC C-11-76 Condition 39 / ATC C-11-77 Condition 40 / ATC C-11-78 Condition 36)*

Rule 3.4, Requirement #14 (Permit Condition) – Recordkeeping Requirements

The Permit Holder shall maintain records of the actual volume of material transferred into this tank (including inter tank transfers) on a quarterly basis. Records shall be maintained for a period of five (5) years and shall be made readily available to the Air Pollution Control Officer upon request. [District Rule 3.4] *(Title V Condition II.D3.1 / ATC C-11-76 Condition 40 / ATC C-11-77 Condition 41 / ATC C-11-78 Condition 37)*

H. District Rule 3.8 – Federal Operating Permits

Rule Description

This rule implements the requirements of Title V of the Federal Clean Air Act as amended in 1990 (CAA) for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

Compliance Status

The facility is a federal major source due to potential to emit over 25 tons VOC per year. The version of the rule used in this evaluation was adopted on April 11, 2001 and is part of the current California SIP. Currently, the facility is operating under Federal Title V Operating Permit F-00012-8, effective August 15, 2011. The source has requested that ATC applications C-11-76, C-11-77, and C-11-78 be processed under the Enhanced New Source Review provisions of District Rule 3.4, Section 404.

The proposed Title V permit is considered a significant permit modification, since the proposed permit modifications contained in the ATCs result in a greater than de minimis increase in hazardous air pollutants at the facility.

Per the requirements of Section 409.1(b), the District's shall provide written notice to the U.S. EPA and CARB of the project that shall include this evaluation (Statement of Basis), the proposed Title V permit ("proposed decision"), and proposed ATCs C-11-76, C-11-77, and C-11-78. The District will also publish the public notice for this project in at least one general circulation newspaper. The notice shall inform the public of the 30 day public comment period commencing on the day that the notice is published.

The following conditions will be contained in the proposed Title V permit and will not be placed on the ATCs.

Rule 3.8, Requirement #1 (Permit Condition) – Right of Entry

The permit shall require that the source allow the entry of the District, CARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and
- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]
(Title V Condition IV.I, 1)

Rule 3.8, Requirements #2-7 (Permit Conditions) – Compliance with Permit Conditions

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11(a)] *(Title V Condition IV.J.1)*

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11(b)] *(Title V Condition IV.J.2)*

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11(c)] *(Title V Condition IV.J.3)*

The Permit Holder shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11(d)] *(Title V Condition IV.J.4)*

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11(e)] *(Title V Condition IV.J.5)*

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11(f)] *(Title V Condition IV.J.6)*

Rule 3.8, Requirement #8 (Permit Condition) – Emergency Provisions

Within two (2) weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- a. An emergency occurred;
- b. The Permit Holder can identify the cause(s) of the emergency;
- c. The facility was being properly operated at the time of the emergency;
- d. All steps were taken to minimize the emissions resulting from the emergency; and
- e. Within two (2) working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12] *(Title V Condition IV.K.1)*

Rule 3.8, Requirement #9 (Permit Condition) – Severability

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgment shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13] *(Title V Condition IV.L.1)*

Rule 3.8, Requirement #10 – Compliance Certification (Annual)

Section 302.14(a) of Rule 3.8 requires:

"The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete;"

Streamlining Demonstration: In order to assure the timely submittal of the yearly compliance report required by this section, the District has amended the condition to include explicit reporting and submittal dates (under the provisions of Rule 3.4,

Section 409). The revised condition requires that the yearly reporting period begin on the Title V permit's initial issuance date, and that the report be submitted within a month of the end of the reporting period.

Streamlined Permit Condition

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. The twelve (12) month period shall be January 1 through December 31, and shall be submitted by January 30 following the reporting period, unless otherwise approved in writing by the District. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [District Rule 3.4 and District Rule 3.8, §302.14(a)] *(Title V Condition IV.M.1)*

Rule 3.8, Requirements #11-13 (Permit Conditions) – Compliance Certification (General)

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [District Rule 3.8, §302.14(b)] *(Title V Condition IV.M.2)*

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14(c)] *(Title V Condition IV.M.3)*

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [District Rule 3.8, §302.14(d)] *(Title V Condition IV.M.4)*

Rule 3.8, Requirement #14 (Permit Condition) – Permit Life

The Title V permit shall expire five (5) years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15] *(Title V Condition IV.N.1)*

Rule 3.8, Requirement #15 (Permit Condition) – Payment of Fees

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16] *(Title V Condition IV.O.1)*

Rule 3.8, Requirement #16 (Permit Condition) – Permit Revision Exemption

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [District Rule 3.8, §302.22] (*Title V Condition IV.P.1*)

Rule 3.8, Requirements #17-19 (Permit Conditions) – Application Requirements

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than eighteen (18) months and no later than six (6) months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2] (*Title V Condition IV.Q.1*)

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3] (*Title V Condition IV.Q.2*)

The Permit Holder shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and
- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4] (*Title V Condition IV.Q.3*)

Rule 3.8, Requirement #20 (Permit Condition) – Permit Reopening for Cause

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is three (3) years or greater, no later than eighteen (18) months after the promulgation of such requirement (where less than three (3) years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or

- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1] *(Title V Condition IV.R.1)*

Rule 3.8, Requirement #21 (Permit Condition) – Recordkeeping

The Permit Holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

- a. Date, place, and time of sampling;
- b. Operating conditions at the time of sampling;
- c. Date, place, and method of analysis; and
- d. Results of the analysis. [District Rule 3.8, §302.6(a)] *(Title V Condition IV.S.1)*

Rule 3.8, Requirement #22 (Permit Condition) – Recordkeeping (Retention)

The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6(b)] *(Title V Condition IV.S.2)*

Rule 3.8, Requirement #23-25 (Permit Conditions) – Reporting Requirements (General)

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than ten (10) days after detection. [District Rule 3.8, §302.7(a)] *(Title V Condition IV.T.1)*

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7(c)] *(Title V Condition IV.T.3)*

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7(e)] *(Title V Condition IV.T.4)*

Rule 3.8, Requirement #26 – Reporting Requirements (Semi-Annual)

Section 302.7(b) of Rule 3.8 requires:

"A monitoring report shall be submitted at least every six (6) months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8."

Streamlining Demonstration: In order to assure the timely submittal of the semi-annual compliance report required by this section, the District has amended the condition to include explicit reporting and submittal dates (under the provisions of Rule 3.4, Section 409).

Streamlined Permit Condition

A semi-annual monitoring report shall be submitted at least every six (6) consecutive months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8. The six (6) month periods shall be January 1 through June 30 and July 1 through December 31. The reports shall be submitted by July 30 and January 30 following each reporting period, respectfully, unless otherwise approved in writing by the District. [District Rule 3.4 and District 3.8, §302.7(b)]

I. 40 CFR Part 60 - Subpart A – General Provisions

Rule Description

This federal subpart provides the general provisions of 40 CFR Part 60.

Compliance Status

None of the affected gasoline storage tanks of P-54-93(a5) [Tank #15], P-66-93(a2) [Tank #16], and P-45-94 (a3) [Tank #18] are subject to the requirements of the subpart.

Permit Conditions

No condition required.

J. 40 CFR Part 60 - Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids

Rule Description

This subpart provides performance standards for petroleum liquid storage vessels that commenced construction or modification after June 11, 1973 and prior to May 19, 1978.

Compliance Status

Per Section 60.110(c)(1) and 60.110(c)(2), the provisions of this subpart apply to petroleum liquid storage tanks that: (1) have a capacity greater than 40,000 gallons, but less than 65,000 gallons, and that commenced construction or modification after March 8, 1974, and prior to May 19, 1978; or (2) have a capacity greater than 65,000 gallons and commenced construction or modification after June 11, 1973, and prior to May 19, 1978. None of the gasoline storage tanks of P-54-93(a5) [Tank #15], P-66-93(a2) [Tank #16], and P-45-94 (a3) [Tank #18] are subject to the requirements of the subpart, since all of the tanks were constructed after May 19, 1978.

Permit Conditions

No condition required.

K. 40 CFR Part 60 - Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids

Rule Description

This subpart provides performance standards for petroleum liquid storage vessels that commenced construction or modification after May 18, 1978 and prior to July 23, 1984.

Compliance Status

Per Section 60.110a(a), the provisions of this subpart apply to petroleum liquid storage tanks that have a capacity greater than 40,000 gallons and were constructed or modified after May 18, 1978 and prior to July 23, 1984. None of the gasoline storage tanks of P-54-93(a5) [Tank #15], P-66-93(a2) [Tank #16], and P-45-94 (a3) [Tank #18] are not subject to the requirements of the subpart, since all of the tanks were constructed after July 23, 1984.

Permit Conditions

No conditions required.

L. 40 CFR Part 60 - Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

Rule Description

This subpart provides performance standards for volatile organic liquid (including petroleum liquid) storage vessels that commenced construction or modification after July 23, 1984.

Compliance Status

Per Section 60.110b(a), the provision of this subpart apply to storage tanks that: have a capacity greater than 75 cubic meters (19,813 gallons), but less than 151 cubic meter (39,890 gallons); and that were constructed or modified after July 23, 1984. None of the gasoline storage tanks of P-54-93(a5) [Tank #15], P-66-93(a2) [Tank #16], and P-45-94 (a3) [Tank #18] are not subject to the requirements of the subpart, since all of the tanks have a storage capacity greater than 39,890 gallons.

Permit Conditions

No conditions required.

M. 40 CFR Part 60 - Subpart XX – Standards of Performance for Bulk Gasoline Terminals

Rule Description

This federal subpart provides performance standards for loading racks at bulk gasoline terminals that commenced construction or modification after December 17, 1980.

Compliance Status

None of the gasoline storage tanks of P-54-93(a5) [Tank #15], P-66-93(a2) [Tank #16], and P-45-94 (a3) [Tank #18] are subject to the loading rack specific requirements of the subpart.

Permit Condition

No condition required.

N. 40 CFR Part 63 - Subpart A – National Emission Standards for Hazardous Air Pollutants (NESHAP) General Provisions

Rule Description

This federal subpart provides the general provisions of 40 CFR Part 63.

Compliance Status

The source is now subject to the general provisions of the subpart, since the gasoline loading rack is subject to the requirements of 40 CFR Part 63 - Subpart BBBBBB, Table 3. According to District policy, the requirements following requirements will only be placed in the Title V Permit, and will not appear on the ATCs.

Rule Requirement #1 (Facility Wide Permit Condition) - General Provisions

The Permit Holder shall comply with the applicable provisions of 40 CFR Part 63 - Subpart A (General Provisions) as identified in Table 3 of 40 CFR Part 63 - Subpart BBBBBB:

- a. Part 63.1 – Applicability;
- b. Part 63.4 – Prohibited activities and circumvention;
- c. Part 63.6 – Compliance with standards and maintenance requirements;
- d. Part 63.7 – Performance testing requirements;
- e. Part 63.8 – Monitoring Requirements;
- f. Part 63.9 – Notification requirements;
- g. Part 63.10 – Recordkeeping and reporting requirements;
- h. Part 63.11 – Control device and work practice requirements;
- i. Part 63.12 – State authority and delegations;
- j. Part 63.13 – Addresses of State air pollution control agencies and EPA Regional Offices;
- k. Part 63.14 - Incorporations by reference; and
- l. Part 63.15 – Availability of information and confidentiality. [40 CFR Part 63 - Subpart A, and 40 CFR Part 63 - Subpart BBBBBB, Table 3] (*Title V Condition II.D3.2*)

O. 40 CFR PART 63 - Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

Rule Description

The subpart establishes emission standards to affected bulk gasoline terminals having a gasoline throughput greater than 75,700 liters per day and an emission

screening factor above 1, or that is a major source of hazardous air pollutants (HAPs).

Compliance Status

Per the requirements of Section 63.420(a)(2), the source has certified in a letter dated October 7, 2011, the bulk gasoline terminal is not a major source of HAPs since it does not emit more than 10 tons per year of any single HAP, or 25 tons per year of any combination of HAPs.

Permit Condition

No condition required.

P. 40 CFR PART 63 - Subpart CC – NESHAP from Petroleum Refineries

Rule Description

This subpart establishes requirements to reduce air pollution from petroleum refining operations.

Compliance Status

The operation is not considered a petroleum refining operation and therefore is not subject to the requirements of the rule.

Permit Condition

No conditions required.

Q. 40 CFR PART 63 - Subpart WW – National Emission Standards for Storage Vessels (Tanks) – Control Level 2

Rule Description

This subpart establishes emissions control requirements for storage vessels that are subject to other subparts, and through reference, are required to also comply with this rule.

Compliance Status

The affected storage tanks are subject to the requirements of Table 1, Item 2(d) of 40 CFR Part 63 - Subpart BBBBBB, which requires compliance with the provisions of certain sections of Subpart WW. The affected tanks are in compliance with the requirements of the rule.

It should be noted that the requirements of this subpart are primarily subsumed or streamlined with the requirements of other rules, with the exception of Rule Requirement #10 which results in an additional condition not previously contained in the Title V Permit.

Rule Requirement #1 – Internal Floating Roof (IFR) Rim Seal Design

Part 63.1063(a)(1)(i) requires that affected gasoline storage tanks:

"An IFR shall be equipped with one of the seal configurations listed in paragraph (a)(1)(i)(A) through (a)(1)(i)(C) of this section.

(A) A liquid-mounted seal.

(B) A mechanical shoe seal.

(C) Two seals mounted one above the other. The lower seal may be vapor-mounted.

(D) If the IFR is equipped with a vapor-mounted seal as of the proposal date for a referencing subpart, paragraphs (a)(1)(i)(A) through (a)(1)(i)(C) of this section do not apply until the next time the storage vessel is completely emptied and degassed, or 10 years after promulgation of the referencing subpart, whichever occurs first."

Subsuming Demonstration for Rim Seal Design: The internal floating roof requirements of Section 63.11087(a) (and by reference 40 CFR Part 63 - Subpart BBBB, Part 63.11087(a) and Table 1, Item 2(d) have been subsumed by the District Rule 3.4 permit requirement (located in the "Control Equipment Inventory") which requires each affected gasoline storage tank to operate an internal floating roof tank (welded or bolted) with a mechanical shoe primary seal and rim mounted secondary seal).

Related Requirements from Other Rules

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 – Subpart BBBB)

Permit Condition

No condition required.

Rule Requirement #2 – Operational Requirements (Floating on Liquid Surface)

Part 63.1063(b)(1) requires that affected gasoline storage tanks:

"The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof)."

Streamlining Demonstration: As previously discussed in Rule Requirement #2 of District Rule 2.21, the floating roof liquid contact requirements 40 CFR Part 63.1063(b)(1) have been streamlined with the requirements of Section 301.3 of Rule 2.21.

Related Requirements from Other Rules

District Rule 2.21, Section 301.3 (See Rule Requirement #2 of District Rule 2.21)

40 CFR Part 63.1063(b)(2) (see Rule Requirement #3 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 – Subpart BBBB)

Streamlined Permit Condition

See Rule Requirements #2 of District Rule 2.21.

Rule Requirement #3 – Operational Requirements (Refloating Roof)

Part 63.1063(b)(2) requires that affected gasoline storage tanks:

"When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical."

Streamlining Demonstration: As previously discussed in Rule Requirement #2 of District Rule 2.21, the continuous refilling requirement of 40 CFR Part 63.1063(b)(2) and Section 301.3 of Rule 2.21 have been streamlined into a single condition.

Related Requirements from Other Rules

District Rule 2.21, Section 301.3 (see Rule Requirement #2 of District Rule 2.21)

40 CFR Part 63.1063(b)(1) (see Rule Requirement #2 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 – Subpart BBBB))

Streamlined Permit Condition

See Rule Requirements #2 of District Rule 2.21.

Rule Requirement #4 – Operational Requirements (Closed Covers)

Part 63.1063(b)(3) requires that:

"Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access."

Streamlining Demonstration: As previously discussed in Rule Requirement #9 of District Rule 2.21, the closed cover requirement of 40 CFR Part 63.1063(b)(3) have been streamlined with the requirements of Section 305.1(b) of Rule 2.21.

Related Requirements from Other Rules

District Rule 2.21, Sections 305.1(b), 305.1(d), 305.2(c), and 305.2(g) (see Rule Requirements #8, #9, #10 and #14 of District Rule 2.21)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 – Subpart BBBB))

Permit Condition

See Rule Requirements #8, #9, #10 and #14 of District Rule 2.21.

Rule Requirement #5 – Operational Requirements (Closed Vents)

Part 63.1063(b)(4) requires that:

"Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design."

Streamlining Demonstration: As previously discussed in Rule Requirements #12 and 13 of District Rule 2.21, the closed vent requirements of 40 CFR Part 63.1063(b)(4) have been streamlined with the requirements of Sections 305.2(b) and 305.2(c) of Rule 2.21.

Related Requirements from Other Rules

District Rule 2.21, Sections 305.2(b) and 305.2(c) (see Rule Requirements #12 and #13 of District Rule 2.21)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 – Subpart BBBBBB)

Permit Condition

See Rule Requirements #12 and #13 of District Rule 2.21.

Rule Requirement #6 – Operational Requirements (Guidepole Covers)

Part 63.1063(b)(5) requires that:

"Each unslotted guidepole cap shall be closed at all times except when gauging the liquid level or taking liquid samples"

Streamlining Demonstration: As previously discussed in Rule Requirement #10 of District Rule 2.21, the guidepole cover requirement of 40 CFR Part 63.1063(b)(5) have been streamlined with the requirements of Section 305.1(c) of Rule 2.21.

Related Requirements from Other Rules

District Rule 2.21, Section 305.1(c) (see Rule Requirement #10 of District Rule 2.21)

40 CFR Part 63.11087(a) and Table 1, Item 2(d) (see Rule Requirement #2 of 40 CFR Part 63 – Subpart BBBBBB)

Permit Condition

See Rule Requirement #10 of District Rule 2.21.

Rule Requirement #7 – Inspection Frequency

Part 63.1063(c)(1)(i) requires that the internal floating roofs be inspected:

"(A) At least once per year the IFR shall be inspected as specified in paragraph (d)(2) of this section.

(B) Each time the storage vessel is completely emptied and degassed, or every 10 years, whichever occurs first, the IFR shall be inspected as specified in paragraph (d)(1) of this section."

Streamlining Demonstration for Visual Inspections: As previously discussed in Rule Requirement #27 of District Rule 2.21, the visual inspection requirements of 40 CFR Part 63.1063(c)(1)(i)(A) and 40 CFR Part 63.1063(d)(2) (and by reference 40 CFR Part 63.11092(e)(1)) have been streamlined with the requirements of Section 502.2(a) of District Rule 2.21. The yearly inspection frequency of 40 CFR 63.1063(c)(1)(i)(A) has been subsumed by the more stringent 3 month inspection requirements of Section 502.2(a) of District Rule 2.21.

Subsuming Demonstration for 10 Year Inspection Frequency for P-54-93(a5) [Tank #15] and P-66-93(a2) [Tank #16]: As previously discussed in Rule Requirement #28 of District Rule 2.21, the inspection frequency of 40 CFR Part 63.1063(c)(1)(i)(B) (and by reference 40 CFR Part 63.11092(e)(1)) have been subsumed by the more stringent requirements of District Rule 3.4.

Subsuming Demonstration for P-45-94(a3) [Tank #18]: As previously discussed in Rule Requirement #28 of District Rule 2.21, the inspection provisions of 40 CFR Part 63.1063(c)(1)(i)(B) have been streamlined with the inspection requirements of Section 502.2(b).

Streamlining Demonstration (Facility Wide): As previously discussed in Rule Requirement #28 of District Rule 2.21, the inspection provisions requirements of 40 CFR Part 63.1063(c)(1)(i)(B) have been streamlined with the primary and secondary seal gap measurement requirements of Section 502.2(b). Also as previously discussed in Rule Requirement #28 of District Rule 2.21, the inspection provisions of 40 CFR Part 63.1063(c)(1)(i)(B) have been streamlined with the deck fitting gap measurement requirements of Section 502.2(c).

Related Requirements from Other Rules

District Rule 2.21, Sections 502.2(a), 502.2(b), and 502.2(c) (see Rule Requirements #25 and #26 of District Rule 2.21)

District Rule 3.4 (see Rule Requirement #16 of District Rule 3.4)

40 CFR Part 63.1063(d)(1) (see Rule Requirement #8 of 40 CFR Part 63 – Subpart WW)

40 CFR Part 63.11092(e)(1) (see Rule Requirement #3 of 40 CFR Part 63 – Subpart BBBB)

Streamlined and Subsuming Permit Conditions

See Rule Requirements #25 and #29 of District Rule 2.21.

Rule Requirement #8 – Inspection Procedure Requirements

Part 63.1063(d)(2) requires that:

"Tank-top inspections of IFR's shall be conducted by visually inspecting the floating roof deck, deck fittings, and rim seal through openings in the fixed roof. Any of the conditions described in paragraphs (d)(1)(i) through (d)(1)(iv) of this section constitutes inspection failure. Identification of holes or tears in the rim seal is required only for the seal that is visible from the top of the storage vessel."

Streamlining Demonstration for the Visual Inspections: As previously discussed in Rule Requirement #27 of District Rule 2.21, the visual inspection requirements of 40 CFR Part 63.1063(c)(1)(i)(A) and 40 CFR Part 63.1063(d)(2) (and by reference 40 CFR Part 63.11092(e)(1)) have been streamlined with the requirements of Section 502.2(a) of District Rule 2.21.

Related Requirements from Other Rules

District Rule 2.21, Section 502.2(a) (see Rule Requirement #24 of District Rule 2.21)

40 CFR Part 63.1063(c)(1)(i) (see Rule Requirement #7 of 40 CFR Part 63 – Subpart WW)

40 CFR Part 63.11092(e)(1) (see Rule Requirement #3 of 40 CFR Part 63 – Subpart BBBBBB)

Permit Condition

See Rule Requirement #27 of District Rule 2.21.

Rule Requirement #9 – Record-keeping

Part 63.1065 establishes the record-keeping provisions for affected gasoline storage tanks.

Streamlining Demonstration: As previously discussed for Rule Requirement #33 of District Rule 2.21, the recordkeeping requirements of 40 CFR Part 63.1065 (and by reference 40 CFR Part 63.11094(a)) have been streamlined with the requirements of Section 504 of District Rule 2.21.

Related Requirements from Other Rules

District Rule 2.21, Section 504 (see Rule Requirement #30 of District Rule 2.21)

40 CFR Part 63.11094(a) (see Rule Requirement #7 of 40 CFR Part 63 – Subpart BBBBBB)

Permit Condition

See Rule Requirements #33 of District Rule 2.21.

Rule Requirement #10 – Reporting Requirements

Part 63.1066 requires that an affected source submit the applicable reports.

Streamlining Demonstration: The report requirements Part 63.1066 have been streamlined with the requirements of 40 CFR Part 63.1195(a)(1).

Related Requirements from Other Rules

40 CFR Part 63.11095(a)(1) (see Rule Requirement #8 of 40 CFR Part 63 – Subpart BBBBBB)

Permit Condition

The Permit Holder shall submit the required notifications and periodic reports (as applicable) which satisfy the requirements of:

- a. Part 63.1066(a) – Notification of Initial Startup;
- b. Part 63.1066(b)(1) – Notification of Inspection;
- c. Part 63.1066(b)(2) – Inspection Results;
- d. Part 63.1066(b)(3) – Request for Alternative Devices; and/or
- e. Part 63.1066(b)(4) – Requests for extensions. [40 CFR Part 63.1066 and 40 CFR Part 63.11095(a)(1)] *(Title V Condition II.D3.3 / ATC C-11-76 Condition 61 / ATC C-11-77 Condition 62 / ATC C-11-78 Condition 58)*

R. 40 CFR PART 63 - Subpart BBBBBB – NESHA¹ for Source Category (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipelines)

Rule Description

This subpart establishes requirements to reduce air pollution from new and existing gasoline bulk distribution terminals and pipeline facilities.

Compliance Status

Per Section 63.11087(a), storage tanks operating at affected facilities must comply with the provisions of the rule. Therefore, this subpart applies to the three gasoline storage tanks of P-54-93(a5) [Tank #15], P-66-93(a2) [Tank #16], and P-45-94(a3) [Tank #18]. This evaluation will only address the Subpart BBBBBB requirements as they pertain to only the three gasoline storage tanks with individual storage capacities above 75 cubic meters (19,813 gallons). The source is currently in compliance with the rule.

It should be noted that the requirements of this subpart are primarily subsumed or streamlined with the requirements of other rules.

Rule Requirement #1 - Applicability

Section 63.11081(a)(1) requires that bulk gasoline terminals comply with this subpart if the affected facility is not subject to the control requirements of 40 CFR Part 63, Subpart R (National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Station) or 40 CFR Part 63, Subpart CC (NESHA¹ from Petroleum Refineries). As previously discussed the bulk terminal is not subject to the requirements of either Subpart R or Subpart CC.

Section 63.11083(b) requires that an existing facility (constructed prior to November 9, 2006) establish compliance with the applicable requirements no later than January 10, 2011. On January 10, 2011, the District received the source's Notice of Compliance Status required by the subpart (see file). The document certifies that the source is in compliance with the requirements of the subpart.

Rule Requirement #2 – Gasoline Storage Tanks Requirements

Part 63.11087(a) requires that affected gasoline storage tanks:

"... meet each emission limit and management practice in Table 1 to this subpart that applies to your gasoline storage tank."

As indicated in the facility's Notice of Compliance Status, the source has chosen to comply with the requirements of Table 1, Item 2(d) which are:

"Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in §63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of §63.1063(a)(2) if such storage tank does not currently meet the requirements of §63.1063(a)(1)."

Subsuming Demonstration for Rim Seal Design: As previously discussed for Rule Requirement #2 of 40 CFR Part 63 - Subpart WW, the internal floating roof requirements of Section 63.11087(a) (and by reference Subpart BBBB - Table 1, Item 2(d) and 40 CFR Part 63.1063(a)(1)(i) have been subsumed by the District Rule 3.4 permit requirement (located in the "Control Equipment Inventory") which requires each affected gasoline storage tank to operate an internal floating roof tank (welded or bolted) with a mechanical shoe primary seal and rim mounted secondary seal).

Streamlining Demonstration for Operational Requirements: As previously discussed for Rule Requirements #2, 9, 10, 11, 12, 13 and 14 of Rule 2.21, the operating requirements of 40 CFR Part 63.1187(a) have been subsumed by the applicable requirements of District Rule 2.21 and 40 CFR Part 63.1063.

Related Requirements from Other Rules

District Rule 2.21, Sections 301.3, 305.1(b) through (d), 305.2(b), 305.2(c), and 305.2(g) (see Rule Requirements #2, #8, #9, #10, #11, #12, #13, and #14 of District Rule 2.21)

40 CFR Part 63.1063(a)(1)(i) (see Rule Requirement #1 of 40 CFR Part 63 - Subpart WW)

40 CFR Part 63.1063(b)(1) through (b)(5) (see Rule Requirements #2, #3, #4, #5, and #6 of 40 CFR Part 63 - Subpart WW)

Streamlining Permit Condition

See Rule Requirements #2, #8, #9, #10, #11, #12, #13, and #14 of District Rule 2.21.

Rule Requirement #3 – Inspection Requirements

Part 63.11092(e)(1) requires that affected gasoline storage tanks:

"If your gasoline storage tank is equipped with an internal floating roof, you must perform inspections of the floating roof system according to the requirements of §60.113b(a) if you are complying with option 2(b) in Table 1 to this subpart, or according to the requirements of § 63.1063(c)(1) if you are complying with option 2(d) in Table 1 to this subpart. "

Related Requirements from Other Rules

District Rule 2.21, Sections 502.2(a), 502.2(b), 502.2(c) (see Rule Requirements #24, #28, and #29 of District Rule 2.21)

District Rule 3.4 (see Rule Requirement #16 of District Rule 3.4)

40 CFR Part 63.1063(c)(1)(i) and (d)(1) (see Rule Requirements #7 and #8 of 40 CFR Part 63 – Subpart WW)

Permit Condition

See Rule Requirements #24, #25, and #26 of District Rule 2.21.

Rule Requirement #4 – Initial Notification

Part 63.11093(a) requires an affected facility submit a Notification of Compliance Status in lieu of the Initial Notification Status if the source is in compliance with the of the rule. As previously discussed, the District received the source's NOCS on January 10, 2011.

Permit Condition

No condition required.

Rule Requirement #5 - Notification of Compliance Status

Part 63.11093(b) requires that the NOCS specify which of the compliance options listed in Table 1 the source has chosen to comply with. As previously discussed, the source has chosen to comply with the storage tank requirements of Table 1, Item 2(d) for all bulk gasoline storage tanks located at the facility.

Permit Condition

No condition required.

Rule Requirement #6 – Notification of Performance Test

Part 63.11093(c) requires that the source submit appropriate notification to the District prior to any performance testing required by Part 63.11092(a) or Part 63.11092(b). The affected bulk gasoline storage tanks are not subject to the testing requirements of either Part 63.11092(a) or (b).

Permit Condition

No condition required.

Rule Requirement #7 – Record-keeping Requirements

Part 63.11094(a) requires that an affected facility which has chosen to comply with the requirements of Table 1, Item 2(d), is subject to the provisions of 40 CFR Part 63.1065.

Streamlining Demonstration: As previously discussed for Rule Requirement #33 of District Rule 2.21, the recordkeeping requirements of 40 CFR Part 63.1065 (and by reference 40 CFR Part 63.11094(a)) have been streamlined with the requirements of Section 504 of District Rule 2.21.

Related Requirements from Other Rules

District Rule 2.21, Section 504 (see Rule Requirement #30 of District Rule 2.21)
40 CFR Part 63.1065 (see Rule Requirement #9 of 40 CFR Part 63 - Subpart WW)

Permit Condition

See Rule Requirements #33 of District Rule 2.21.

Rule Requirement #8 – Reporting Requirements

Part 63.11095(a)(1) requires that an affected source that has chosen to comply with the provisions of Table 1, Item 2(d) must include in the semiannual compliance report the information required by 40 CFR Part 63.1066.

Streamlining Demonstration: As previously discussed for Rule Requirement #10 of 40 CFR Part 63 – Subpart WW, the report requirements of Part 63.1066 have been streamlined with the requirements of 40 CFR Part 63.11095(a)(1).

Related Requirements from Other Rules

40 CFR Part 63.1066 (see Rule Requirement #10 of 40 CFR Part 63 – Subpart WW)

Permit Condition

See Rule Requirements #10 of 40 CFR Part 63 - Subpart WW.

Rule Requirement #9 – Leak Detection, Minimization, Repair, and Inspection Log
Part 63.11089(c) requires:

“Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in paragraph (d) of this section.”

Subsuming Demonstration for Leak Detection and Repair: As previously discussed for Rule Requirement #6 of District Rule 2.23, the leak detection and repair requirements of Part 63.11089(c) have been subsumed by the more stringent requirements of Section 302.1(a) of District Rule 2.23.

Subsuming Demonstration for Leak Minimization: As previously discussed for Rule Requirement #7 of District Rule 2.23, the leak minimization requirements of Part 63.11089(c) have been subsumed by the more stringent requirements of Section 302.1(b) of District Rule 2.23.

Streamlining Demonstration for Log Book Requirements: As previously discussed for Rule Requirement #21 of District Rule 2.23, the log book requirements of Part 63.11089(c) have been streamlined with the requirements of 40 CFR Part 63.11094(e) and Section 502 of District Rule 2.23.

Related Requirements from Other Rules

District Rule 2.23, Section 302.1(a) (see Rule Requirement #6 of District Rule 2.23)
District Rule 2.23, Section 302.1(b) (see Rule Requirement #7 of District Rule 2.23)
District Rule 2.23, Section 502 (see Rule Requirement #21 of District Rule 2.22)
40 CFR Part 63.11094(e) (see Rule Requirement #11 of 40 CFR Part 63 - Subpart BBBBBB)

Permit Condition

See Rule Requirements #6, #7, and #21 of District Rule 2.23.

Rule Requirement #10 – Delay of Repair

Part 63.11089(d) requires:

“Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report specified in §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed.”

Streamlining Demonstration: As previously discussed for Rule Requirement #6 of District Rule 2.23, the delayed repair reporting requirements of Part 63.11089(d) have been streamlined with the leak repair requirements of Section 302.1(a) of District Rule 2.23.

Related Requirements from Other Rules

District Rule 2.23, Section 302.1(a) (see Rule Requirement #6 of District Rule 2.23)

Permit Condition

See Rule Requirement #6 of District Rule 2.23.

Rule Requirement #11 – Log Book Requirements

Part 63.11094(e) requires that an affected source:

“... record in the log book for each leak that is detected the information specified in paragraphs (e)(1) through (7) of this section.

(1) The equipment type and identification number.

(2) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).

(3) The date the leak was detected and the date of each attempt to repair the leak.

(4) Repair methods applied in each attempt to repair the leak.

(5) “Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak.

(6) The expected date of successful repair of the leak if the leak is not repaired within 15 days.

(7) The date of successful repair of the leak.”

Streamlining Demonstration: As previously discussed for Rule Requirement #21 of District Rule 2.23, the log book requirements of Part 63.11089(c) have been

streamlined with the requirements of 40 CFR Part 63.11094(e) and Section 502 of District Rule 2.23.

Related Requirements from Other Rules

District Rule 2.23, Section 302.1(a) (see Rule Requirement #21 of District Rule 2.23)

40 CFR Part 63.11089(c) (see Rule Requirement #9 of 40 CFR Part 63 - Subpart BBBB) (see Rule Requirement #9 of 40 CFR Part 63 - Subpart BBBB)

Permit Condition

See Rule Requirement #21 of District Rule 2.23.

S. 40 CFR Part 64 - Compliance Assurance Monitoring

Rule Description

This subpart provides guidelines for developing a Compliance Assurance Monitoring (CAM) Plan. The CAM Plan requires that a facility monitor the appropriate parameters of a process or its control equipment, and/or measure the process' actual emissions, so as to ensure emission compliance on an ongoing basis.

Compliance Status

The CAM requirements apply to any pollutant specific emission unit at a major source that is required to obtain a Part 70 permit and which satisfies all of the following:

- a. The unit is subject to an emission limit or standard for an applicable regulated air pollutant;
- b. The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- c. The unit's pre-control device potential to emit of an applicable regulated pollutant is greater than or equal to that pollutant's major source threshold.

Compliance Status

All emission units at the source are exempt from the requirements of this federal subpart, since none of these emission units have a pre-control device potential to emit greater than or equal to any of the major source thresholds for VOC. Per Section 64.1, seals, lids, roofs, and other control measures that prevent the release of pollutants do not meet the definition of a control device.

Permit Condition

No condition required.